

ML:AXB  
F. #2018R01646

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH  
FACEBOOK USERNAME  
"RICH RAH ODE,"  
WWW.FACEBOOK.COM/RICHRAH1080P,  
THAT IS STORED AT PREMISES  
CONTROLLED BY FACEBOOK, INC.

**To Be Filed Under Seal**

**APPLICATION FOR A SEARCH  
WARRANT FOR INFORMATION  
IN POSSESSION OF A PROVIDER  
(FACEBOOK ACCOUNT)**

Case No. 18-MJ-1227

-----X

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, TATIANA-MARIA BIESS, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with Facebook username "Rich Rah Ode," more specifically, the Facebook account maintained at <https://www.facebook.com/RichRah1080p> (the "SUBJECT ACCOUNT"), which is stored at premises owned, maintained, controlled, or operated by Facebook Inc. ("Facebook"), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the SUBJECT ACCOUNT.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been for approximately one year. I am a member of ATF’s Joint Firearms Task Force, and in that capacity, among other things, I am responsible for investigating firearms-related offenses. My training and experience has included investigating crimes facilitated by the use of electronic communication drives, including smart phones, and social media, including Facebook.

3. Except where otherwise noted, the facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 922(g)(1) (felon in possession of firearms and ammunition), 21 U.S.C. § 841 (distribution of controlled substances), 18 U.S.C. § 924(c) (using, carrying or brandishing a firearm in relation to a drug-trafficking crime and/or crime of violence), 18 U.S.C. § 1959 (violent crime in aid of racketeering) and 18 U.S.C. § 1962 (unlawful racketeering activities) (collectively, the “TARGET OFFENSES”) have been committed, are being committed and will be committed by RODERIC HENDRYX and others. There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

## **PROBABLE CAUSE**

### **I. Background of Investigation**

5. On or about July 29, 2018, a shooting occurred in the vicinity of 110 Chauncey Street, Brooklyn, New York. Footage captured by a nearby surveillance camera showed RODERIC HENDRYX present with the victim ("Victim-1") immediately prior to the shooting. Victim-1 survived, but the shooting remains unsolved.

6. Nine days later, on or about August 7, 2018, New York City Police Department ("NYPD") officers responded to a radio run in the vicinity of 120 Chauncey Street in Bedford Stuyvesant – an address located on the same block as the July 29th shooting.

7. When police arrived, the officers observed multiple adult males, including RODERIC HENDRYX, on the sidewalk. The officers observed an L-shaped bulge in HENDRYX's waistband. When one of the officers exited the vehicle, HENDRYX fled on foot.

8. The officers pursued HENDRYX eastbound on Chauncey Avenue, northbound on Malcolm X Boulevard, and eastbound onto Bainbridge Street. When HENDRYX reached 218 Bainbridge Street, the officers observed him remove a firearm from his waistband and throw it over a fence that surrounded a vacant lot.

9. Subsequently, the officers recovered a loaded .38 caliber Charter Arms revolver from the premises known as 175-A Chauncey Street – a residential property whose rear yard abuts 218 Bainbridge Street.

10. HENDRYX was placed under arrest and charged with criminal possession of a weapon.

11. Following his arrest, a search of police records revealed that on September 28, 2012, RODERIC HENDRYX was convicted in Brooklyn, New York, for attempted burglary in the third degree, a Class E felony.

12. On August 30, 2018, a grand jury in the Eastern District of New York returned an indictment charging HENDRYX with possessing a loaded .38 caliber Charter Arms revolver after having previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, in violation of 18 U.S.C. § 922(g)(1). See United States v. Hendryx, No. 18-CR-478 (ENV).

13. Agents of the ATF are continuing to investigate HENDRYX in relation to the crime charged and the TARGET OFFENSES.

14. In connection with this investigation, ATF has determined that RODERIC HENDRYX uses the Facebook page with the username “Rich Rah Ode” (previously defined as the “SUBJECT ACCOUNT”), and, as set forth below, there is reason to believe that the SUBJECT ACCOUNT contains evidence relevant to the TARGET OFFENSES.

## **II. The SUBJECT ACCOUNT is Likely to Contain Relevant Evidence**

### **A. Evidence of Access to Firearms**

15. A review of publicly available content for the SUBJECT ACCOUNT shows content indicating that HENDRYX possesses and has access to firearms and ammunition, and that he had such access in the months leading up to his arrest for unlawfully possessing a loaded handgun in this case.

16. As demonstrated in the following paragraphs, publicly available content on the SUBJECT ACCOUNT makes repeated references to possessing and using firearms, including against law enforcement:

- On July 7, 2016, the SUBJECT ACCOUNT posted a photo of the rapper Tupac Shakur giving the middle finger while a police officer stands beside him. The SUBJECT ACCOUNT captioned the photo with animated images depicting a firearm shooting at a police officer's head.
- On December 6, 2016, the SUBJECT ACCOUNT shared a message from an individual using the Facebook username "Brent Jules," stating "I keep my shooter beside of me!! #GangGang!! #CCLyfeStyle #WarTime." Based on my training and experience, I understand the term "shooter" to relate to a person who is known to carry a firearm or who can be relied upon to use a firearm if needed. I understand the hashtag "CCLyfeStyle" to be a reference to the Crips gang.
- On December 14, 2016, the SUBJECT ACCOUNT posted a photo of HENDRYX wearing a blue jacket and blue hat standing with an unknown individual on a street corner. The caption again reads, in part, "I keep a shooter #beside me," followed by animated images of a gun, explosions, and the word "glit." Based on my training and experience, I know that "glit" and similar variations of the word are used to simulate the sound of a gun firing. Also, as discussed in more detail below, the blue jacket and hat are consistent with being a member of the Crips gang.
- On April 20, 2018, the SUBJECT ACCOUNT posted a message stating, "Niggas take pics wit guns n still get shot wtf yu left the gun in da photo gallery." Based on my training and experience, I understand this message to be criticizing

individuals who post photographs with firearms on social media to demonstrate street credibility, but are not able to defend themselves from actual violence.

- On April 23, 2018, the SUBJECT ACCOUNT posted a message stating, “Niggas be 30 deep w 1 gun, 4 fighters and 26 runners,” followed by an animated image of an individual using his hand to cover his face.
- On May 19, 2018 – less than three months before HENDRYX was arrested for criminal possession of a firearm – the SUBJECT ACCOUNT posted a message stating, “Always wanted a Draco” and “X dat off da list,” followed by an animated image of a snickering face. In my training and experience, I know that a Draco is a type of firearm. I believe the expression “X that off da list” means that the user of the SUBJECT ACCOUNT had acquired a Draco firearm. The firearm that HENDRYX was arrested for possessing was not a Draco. Based on this recent post, I submit that there is probable cause to believe that HENDRYX has access to multiple firearms.

**B. Evidence of Gang Affiliation**

17. A review of the publicly available content for the SUBJECT ACCOUNT also shows multiple posts indicating that HENDRYX is a longstanding member of the Crips street gang.

18. For example, the cover photograph on the SUBJECT ACCOUNT is a picture of HENDRYX covering a portion of his face with a blue bandana. Based on my training and experience, I know that blue-colored apparel is typically worn by members of the Crips to identify themselves to other members, as well as to rival gangs.

19. The SUBJECT ACCOUNT also features the following publicly available content, which demonstrates HENDRYX's longstanding gang affiliation:

- On December 30, 2015, the SUBJECT ACCOUNT posted a photo of several individuals wearing blue bandanas partially covering their faces.
- On February 22, 2016, the SUBJECT ACCOUNT posted a photo of an individual with the Facebook handle "Sean McQueen." The SUBJECT ACCOUNT captioned the photo, in part, "Gang ova everything."
- On April 19, 2016, the SUBJECT ACCOUNT posted an image of the rapper Snoop Dogg dressed in blue clothing with overlaid writing that stated "Oh U Crip now Cuzz? What Set U Claim."
- On July 7, 2016, the SUBJECT ACCOUNT posted a photo of HENDRYX wearing a blue baseball cap and displaying a blue bandana on his left hip. He is seen sitting on a blue milk crate in the center lane of a street. Another individual using the Facebook handle "Polite MikeyMike" commented on the photo, stating "CRIPS WE TAKE OVER THE STREETS." The SUBJECT ACCOUNT replied, "More A8ove." Based on my training and experience, I know that in written messages Crips will often replace the letter "B" with other characters, including "C" and "8," to demonstrate their rivalry with the Bloods street gang.
- On December 8, 2017, the SUBJECT ACCOUNT shared a music video entitled "Brooklyn Crips Make Dope Anthem!"
- On December 14, 2017, the SUBJECT ACCOUNT posted a birthday message to an unknown individual, which read, in part, "Happy Cday." As noted above, the

substitution of a “C” for a “B” in this message is consistent with membership in the Crips. An individual using the Facebook handle “Tisha Jones” commented on the photo with an image of a cake featuring gang imagery. Specifically, the image shows a blue cake covered in a blue bandana with a hand forming the letter “C” mounted on top.

- On June 4, 2018, the SUBJECT ACCOUNT posted a photo of HENDRYX smoking what appears to be a marijuana cigarette, with a caption reading, in part, “Fucc da laws and whoever against yu,” following by blue-colored hearts.
- On July 28, 2017, the SUBJECT ACCOUNT publicly posted a message stating, in part, “We rep our gang wit loyalty Fucc ya pride.”
- On October 31, 2018, the SUBJECT ACCOUNT posted a photo of HENDRYX and an individual using the Facebook handle “Blue Datt” smoking what appears to be a marijuana cigarette. The individual referred to as “Blu Datt” commented on the post, stating “SMOKE SESSION WIT THE LOC” and identifying HENDRYX using his Facebook handle, “Rich Rah Ode.” Based on my training and experience, I understand that “LOC” is an acronym for the phrase “Love of Crips” and/or “Life of Crips,” and is used by members of the gang to refer to one another.

**C. Evidence of Drug Use**

20. The SUBJECT ACCOUNT also features publicly available content indicative of regular drug use and drug distribution. For example:



- On December 17, 2016, the SUBJECT ACCOUNT posted a photograph of HENDRYX and another individual standing on top of an NYPD squad car and giving the middle finger. An individual using the Facebook handle “Aaron Parker” commented on the photo, stating “BROOKLYN you ALREADY SNOW.” Based on my training and experience, I know that “snow” is a term used to describe cocaine.
- On December 20, 2016, the SUBJECT ACCOUNT posted a photo of HENDRYX appearing to smoke a marijuana cigarette in the kitchen of a house. The caption reads, in part, “Meet me in da #traphouse.” Based on my training and experience, I know that a “traphouse” is term used to describe a location where, among other things, drugs are stashed and drug deals occur.
- As noted above, on June 4, 2018 and October 31, 2018, the SUBJECT ACCOUNT posted photos of HENDRYX smoking what appear to be marijuana cigarettes. The SUBJECT ACCOUNT posted similar photos on June 10, 2018, August 20, 2018 and August 26, 2018. In the photo posted on June 10, 2018, HENDRYX is wearing the same black t-shirt he was seen wearing in surveillance footage from the July 29th shooting.

21. Based on my training and experience, I know that members of the Crips gang frequently carry firearms and use drug trafficking as way to earn money for themselves and the gang, as well as to maintain and increase their position within the gang. Moreover, I believe that the Facebook posts described herein establish probable cause that HENDRYX is a longstanding member of the Crips, has access to firearms, such as the .38 caliber Charter

Arms revolver that was recovered from 175-A Chauncey Street on August 7, 2018, and is involved in drug dealing. Accordingly, there is probable cause to believe that evidence of the TARGET OFFENSES will be found in the SUBJECT ACCOUNT.

22. On or about October 4, 2018, the government submitted a preservation request to Facebook and requested that it preserve all information and records associated with the Facebook username "Rich Rah Ode."

### **TECHNICAL INFORMATION ABOUT FACEBOOK**

23. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

24. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

25. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a

“Friend Request” accepts the request, then the two users will become “Friends” for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user’s account includes a list of that user’s “Friends” and a “News Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

26. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

27. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

28. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

29. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

30. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

31. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

32. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

33. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

34. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs ("blogs"), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

35. The Facebook Gifts feature allows users to send virtual "gifts" to their friends that appear as icons on the recipient's profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other "pokes," which are free and simply result in a notification to the recipient that he or she has been "poked" by the sender.

36. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

37. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

38. Facebook uses the term “Neoprint” to describe an expanded view of a given user profile. The “Neoprint” for a given user can include the following information from the user’s profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook group identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications.

39. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user’s IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

40. Social networking providers like Facebook typically retain additional information about their users’ accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider’s support

services, as well as records of any actions taken by the provider or user as a result of the communications.

41. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user’s “Neoprint,” IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account

owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

42. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

#### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

43. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

#### **CONCLUSION**

44. Based on the forgoing, I request that the Court issue the proposed search warrant.

45. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A)



& (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).


46. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

**REQUEST FOR SEALING**

47. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation the full extent of which is neither public nor known to all of the targets of the investigation. Accordingly, there is good

cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,

  
\_\_\_\_\_  
Tatiana-Maria Biess  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Subscribed and sworn to before me on 12/17 /, 2018

\_\_\_\_\_  
THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the Facebook username “Rich Rah Ode,” more specifically, the Facebook account maintained at <https://www.facebook.com/RichRah1080p>, which is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered in Menlo Park, California.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Facebook**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc. ("Facebook"), including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for the username listed in Attachment A:

- (a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- (b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;
- (d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend"

requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

- (e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;
- (f) All "check ins" and other location information;
- (g) All IP logs, including all records of the IP addresses that logged into the account;
- (h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- (i) All information about the Facebook pages that the account is or was a "fan" of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Facebook searches performed by the account;
- (l) All information about the user's access and use of Facebook Marketplace;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;

- (p) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C § 922(g), 21 U.S.C. § 841, 18 U.S.C. § 924(c), 18 U.S.C. § 1959 and/or 18 U.S.C. § 1962 involving RODERIC HENDRYX and others since January 1, 2016, including for the Facebook username identified on Attachment A, information pertaining to the following matters:

- (a) The ownership, possession, access or use of any firearms and ammunition, including a black .38 caliber Charter Arms revolver;
- (b) Gang affiliations, gang rivalries, activities, hostilities or violence, including information relating to the July 29, 2018 shooting that occurred in the vicinity of 110 Chauncey Street, Brooklyn, New York;
- (c) The sale or purchase of illicit drugs;
- (d) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- (e) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation; and
- (f) The identity of the person(s) who created or used the SUBJECT ACCOUNT, including records that help reveal the whereabouts of such person(s).